

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Civil Action No. 1:17-cv-02989-AT

DONNA CURLING, et al.,
Plaintiffs,

vs.

BRAD RAFFENSPERGER, et al.,
Defendants.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF
JEFFREY E. LENBERG

DATE: November 21, 2022

TIME: 10:05 a.m. to 6:21 p.m. Eastern

LOCATION: Witness location

REPORTED BY: Felicia A. Newland, CSR

Veritext Legal Solutions
1250 Eye Street, N.W., Suite 350
Washington, D.C. 20005

1 notebook here, but you identified two anomalies.
2 One was the remote with Dominion, the other was
3 the, what you called, reversals, or rejection, rate
4 relating to the ICPs. Were there any other
5 anomalies with respect to the machines that you
6 investigated in Coffee County?

7 A Not that I recollect.

8 Q Did you investigate anything relating
9 to the poll pads?

10 A Ms. Hampton -- while I was there,
11 keep in mind, this was the first time I had seen
12 this, you know, current generation of voting
13 machines, other than me voting at my voting
14 location in New Mexico, so I was learning as much
15 as I could. And she was very helpful in
16 explaining, you know, basic voting systems, Georgia
17 election law. She was quite knowledgeable about
18 Georgia election law. And also about her voting
19 machines. She -- she runs herself. She knows the
20 whole thing.

21 And so the pollbooks, they actually
22 showed me the pollbooks. I believe they actually

1 demonstrated to me the pollbook. But other than
2 telling me how it worked, demonstrating it, they
3 showed me that -- or she showed me that it was
4 connected to the internet during its operation and
5 that they literally could go order Domino's Pizza
6 and have it delivered while it was connected to the
7 internet.

8 Q Okay. Let me shift gears a little
9 bit.

10 Did you know --

11 MR. CLEMENTS: How much --

12 BY MR. BROWN:

13 Q Do you know --

14 MR. CLEMENTS: Bruce, if you're about
15 to shift gears, is there a way that we could maybe
16 take a quick restroom break?

17 MR. BROWN: Absolutely. Let's break
18 for ten minutes. Thank you. Thank you.

19 VIDEOGRAPHER: Going off the record.
20 The time is 11:28 a.m.

21 (Recess from 11:28 a.m. to 11:42 a.m.)

22 VIDEOGRAPHER: Going on the record.